

Modern Slavery Risk and Compliance Policy

Purpose and Scope

This policy outlines Envirolab's commitment to preventing, identifying and addressing modern slavery risks within its operations, supply chains and business relationships. We are committed to conducting business ethically, protecting human rights and complying with all applicable modern slavery legislation.

Scope

This policy applies to all employees, contractors, suppliers, subcontractors and business partners engaged by the organisation.

Policy Statement

The organisation maintains zero tolerance for all forms of modern slavery, including forced labour, bonded labour, child labour, human trafficking, servitude and deceptive recruitment practices. We expect all personnel and suppliers to uphold ethical labour standards and respect internationally recognised human rights.

Modern Slavery Risk Compliance

The organisation will:

- Comply with all applicable modern slavery legislation and contractual obligations.
- Communicate modern slavery expectations to employees, suppliers and contractors.
- Conduct risk-based due diligence and maintain records demonstrating compliance.
- Investigate suspected modern slavery and implement corrective actions where necessary.
- Review this policy and associated procedures periodically to ensure ongoing effectiveness.

Vulnerability Assessment

The organisation will identify workers and supply chains that may be vulnerable to exploitation by considering factors including:

- Use of temporary, migrant, agency or seasonal labour.
- Overseas recruitment practices.

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- Low-skilled work or workers with limited knowledge of their rights.
- High-risk industries, products or geographic locations.
- Language, cultural or financial vulnerabilities.

Where vulnerabilities are identified, appropriate controls and monitoring measures will be implemented to minimise the risk of exploitation.

Modern Slavery Risk Assessment

The organisation will assess modern slavery risks during supplier selection, onboarding and throughout the supplier relationship.

All suppliers are required to:

- Complete a Modern Slavery Risk Assessment prior to onboarding.
- Complete an updated Modern Slavery Risk Assessment at least annually as part of ongoing supplier engagement.
- Cooperate with requests for additional due diligence, audits or supporting evidence where elevated risks are identified.

Risk assessments will consider factors such as geographic location, industry sector, labour practices, recruitment methods, subcontracting arrangements and previous compliance history.

Employment Conditions and Document Checks

The organisation and its suppliers will ensure that workers:

- Receive wages and employment benefits that meet or exceed the applicable legal requirements of the host country.
- Are provided with detailed, accurate and legally compliant employment agreements or equivalent work documentation before commencing employment, and prior to relocation where relocation is required.
- Receive employment agreements and key employment information in a language they understand.
- Retain possession and control of their personal identity documents, passports and work permits. These documents must never be withheld or confiscated.
- Have their identity and legal right to work verified in accordance with applicable laws.
- Are not charged recruitment fees or subjected to unlawful deductions or coercive employment practices.

Trade Union and Workers' Rights

The organisation recognises and respects workers' rights and expects suppliers to:

- Respect workers' freedom of association and the right to join or form trade unions where permitted by law.
- Respect the right to collective bargaining in accordance with applicable legislation.

- Provide fair wages, lawful working hours and safe and healthy working conditions.
- Ensure workers can raise grievances confidentially without fear of discrimination, intimidation or retaliation.
- Treat all workers with dignity, fairness and respect.

Reporting and Response

Employees, contractors, suppliers and other stakeholders are encouraged to report any suspected modern slavery or unethical labour practices through the organisation's reporting channels. Reports will be treated confidentially, investigated promptly and addressed through appropriate corrective actions.

Responsibilities

Management is responsible for implementing this policy, conducting due diligence, monitoring supplier compliance, providing appropriate training and ensuring effective risk management processes are maintained.

Employees, contractors and suppliers are responsible for complying with this policy, participating in required assessments and reporting any suspected breaches.

Review

This policy will be reviewed at least annually, or sooner where legislative changes, emerging risks or organisational changes require updates.